

DENIED

Terry L. Wooten 4/16/13
 TERRY L. WOOTEN DATE
 U. S. DISTRICT JUDGE

BEFORE THE U.S. DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA,
 Columbia Division

Case No. 3:12-cv-2991 - TLW

Marie Assa'ad-Faltas, MD, MPH

Plaintiff

vs.

Jean Toal as administrative head of all SC's state courts;
 Daniel Shearouse, as Clerk of SC's Supreme Court;
 Mark Keel, as Chief of SC's State Law Enforcement Division (SLED);
 LeRoy Smith, as Head of SC's Department of Public Safety;
 Leon Lott as Sheriff of Richland County, SC, and Warden of the
 Alvin S. Glenn Detention Center (ASGDC);
 James R. Barber, III, as SC's Fifth Judicial Circuit's [former] Administrative Judge;
 Daniel Johnson, as SC's Fifth Judicial Circuit's Solicitor;
 Jeanette McBride, as Richland County's Clerk of Court;
 Roslyn Frierson as Director of SC's Office of Court Administration;
 Steven Benjamin, as Mayor, and all members of the
 City of Columbia ("the City") Council;
 Steve Gantt, [to be substituted by Teresa Wilson] manager for the City;
 Dana Turner, falsely bearing a title of Chief Administrative
 Judge of the City's Municipal Court (CMC);
 Randy Scott, falsely bearing a title of the City's Chief of Police;
 Marion Hanna, falsely bearing the title of CMC judge;
 Ken Gaines, Robert G. Cooper, Dana M. Thye, and
 David A. Fernandez, supposed attorneys for the City;
 and all their subordinates who intend to injure Plaintiff;
 all *solely* officially and *solely* for injunctive relief,

Defendants

Plaintiff's Renewed Motion to Reassign this Case upon Reopening it

Orin G. Briggs, counsel for Plaintiff, congratulates the Honorable Terry L. Wooten's elevation to Chief Judge of this U.S. District Court. Counsel is informed and believes that traditionally in this District the Chief Judge hears only criminal cases. This case also challenges the authority and actions of South Carolina's Chief Justice, who may affect every lawyer in this state, including relatives of most of its federal judges. The fact and appearance of impartiality would be best served by reassignment and designation. Please see No. 3:00-2048-17 (D.S.C.), *Hodges v. Shalala*, 121 F.Supp.2d 854 (D.S.C. 2000, Senior U.S. Judge Cook sitting by designation), affirmed *sub nom Hodges et al. v. Thompson et al.*, 311 F.3d 316 (4th Cir. 2002), cert. denied, 540 U.S. 811 (2003).

The undersigned counsel, suffering age and ailments, had orthopedic surgery. Travel to Florence, SC, for hearings and trial, is not impossible but would impose hardships on him and his client.

And assignment to one U.S. District Judge of all cases brought by a given plaintiff is limited to *pro se* cases. This is now a counseled case, with Columbia being the true division for trial.

For all the foregoing reasons, this case should be reassigned to a U.S. District Judge resident in Columbia, SC, or to another Article III judge from another U.S. District or Circuit.

Respectfully submitted on February 10th, 2013.

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